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June 24, 1999



EPA Region 5 Records Ctr.



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via facsimile and U.S. Mail

Mr. Brad Bradley
Remedial Project Manager
U.S. EPA Region V
77 West Jackson Street
Chicago, IL 60606

RE: Remote Fill Property Sampling and Removal Plan at the NL-Taracorp NPL Site

Dear Mr. Bradley:

This letter is to memorialize the sampling and removal plan for remote fill properties that U.S. EPA and ENTACT discussed yesterday during a telephone conference attended by Brad Bradley, Rich Wood and Tim Healy.

As we discussed, there are thirteen (13) previously identified remote fill properties where sampling has occurred and visible evidence exists of battery chips on the property. The attached table summarizes the highest total lead levels identified during previous investigations. The total lead levels range from less than 500 to 1,120 ppm total lead.

In addition, twelve (12) properties have been identified during the last year of activities that indicate that battery chips were used as fill for driveways or grade elevation activities. Mr. Eddie Salmond's property at 210 Roosevelt was one of these 12, and, as you know, this property was remediated by ENTACT in May, 1999.

Therefore, approximately 24 remote fill properties need to be remediated. As agreed, the following procedures will be implemented immediately to complete the remediation of remote fill lots by the end of July, 1999.

The lots will first be segregated by size into two groups: either **small lots** or **large lots**. Small lots will be similar to the size of a typical Granite City lot, approximately 50' x 150'. Large lots will be more similar to Mr. Salmond's size lot, or greater than 50' x 150'.

Small Lot Sampling and Removal Plan

1. Small lots will be sampled in a similar manner to the current sampling procedures used for the airborne impacted properties. Samples will be collected at 3/6/12" depths in the front and back yards and analyzed for total lead.

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2. If sample results indicate that the total lead levels are less than 500 ppm for all depths then no excavation will occur unless there is visual evidence of battery chips. In this case all visible battery chips will be excavated and the area will be restored.
3. If sample results indicate that the total lead levels are greater than 500 ppm for any depth sampled, then excavation will be performed.

The initial sample results will serve as a guide to excavation but will not indicate the final depth. Excavation will occur until visual evidence indicates that the remote fill material has been removed or to a maximum depth of three feet.

If the excavation depth is less than three feet, then a confirmation grab sample will be collected at the approximate same coordinates where the initial sample was collected. Backfilling activities will occur after laboratory results confirm that the cleanup goal of 500 ppm total lead has been achieved.

If the remote fill materials extend beyond a depth of three feet, ENTACT will attempt to remove all the material. However, if the remote fill appears to extend well beyond a depth of three feet, ENTACT will note the address and the depth in the field log book and will place snow fence in the bottom of the excavation prior to backfill. The snow fence will serve as an indicator to future developers that the clean backfill layer has been breached.

Material excavated from this area will be transported to the Taracorp Pile and placed in the waste layer of the pile or transported and disposed of at Milam Landfill, a subtitle D landfill.

4. If sample results indicate that the total lead levels are greater than 1500 ppm, then that sample will be analyzed for TCLP lead for transportation and disposal purposes. If the TCLP lead level is less than 5.0 mg/l, then transportation and disposal will occur as outlined above. If the TCLP lead level is greater than 5.0 mg/l, then the material will be: 1). transported to the Taracorp Pile and placed in the waste layer of the pile, or 2) transported and disposed of at Peoria Disposal, a subtitle C landfill, or 3) treated to non-hazardous levels on the pad at the Taracorp Site and transported and disposed at Milam Landfill.

Every attempt will be made to consolidate the remote fill excavated materials into the waste layer of the Taracorp Pile. However, there is a possibility that final cell closure activities will outpace the remote fill removal activities and the waste layer will be closed off. In this case the TCLP samples collected prior to excavation will be used to determine the appropriate treatment, transportation and disposal option.

Excavation activities at these properties will occur in the same manner as outlined in #3 above.

Remote Fill Properties

Address	Sample Data	Battery Chips	Lots	
2239/41 14th St.	None	Yes	Drive Only?	
1005 Bissell	None	Yes	1	
1009 Bissell	None	Yes	1	
115 Booker	None	Yes	Drive Only?	
119 Booker	None	Yes	1	
121 Booker	None	?	1	
123 Booker	None	Yes	Drive Only?	
126 Booker	<500	Yes	1 (empty)	
206 Booker	604	No	2	
224 Carver	508	No	?	
101 Harrison	778	Yes	2	
212 Harrison	756	No	2	
306 Harrison	642	No	1 (empty)	
206 Hill	<500	Yes	2	
212 Hill	<500	Yes	1	
Lincoln	None	Yes	Drive Only?	
Lincoln	None	Yes	Drive Only?	
Lincoln	None	Yes	Drive Only?	
2108 Nevada	None	Yes	1	
210 Roosevelt	4,500	Yes	3	Done
202 Terry	<500	Yes	2-3 (empty)	
212 Watson	712	Yes	2-3	
213 Watson	<500	Yes	2	
215 Watson	1,120	Yes	1	
217 Watson	<500	Yes	1	

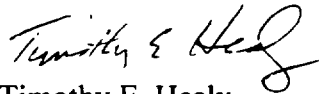
Large Lot Sampling and Removal Plan

Larger lots will be sampled and excavated following the exact procedures as described above for small lots with the following exception: Large lots will be gridded in 50' x 50' grids and each grid will be sampled and excavated. This is the same protocol employed on Mr. Salmond's property at 210 Roosevelt.

ENTACT is currently obtaining access agreements from the remote fill property owners. Sampling activities are expected to occur the week of June 28th and excavation of the remote fill lots is scheduled to begin the week of July 5th.

If you have any questions regarding ENTACT's intended procedures, please contact me at (630) 616-2100 ext.109.

Sincerely,



Timothy E. Healy
Project Manager
ENTACT

attachment: 1

cc: Jeff Leed, Leed Environmental
Sheri Bianchin, U.S. EPA
Charlie Settles, ACOE
Sean McGinty, ACOE
Rich Wood, ENTACT
Pat Vojack, ENTACT